

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

STATUTORY REVIEW OF THE SYSTEM)
FOR REGULATING RATES AND CLASSES)
FOR MARKET DOMINANT PRODUCTS) Docket No. RM2017-3

**SECOND MOTION OF
MPA—THE ASSOCIATION OF MAGAZINE MEDIA
AND ALLIANCE OF NONPROFIT MAILERS
FOR ISSUANCE OF INFORMATION REQUESTS**

(January 25, 2017)

Pursuant to 39 C.F.R. § 3001.21(a), the undersigned parties respectfully request that the Presiding Officer or the Commission issue the questions stated in this motion as information requests to the United States Postal Service. The requested information is necessary to an informed analysis of whether the Postal Service's current and projected future revenue are likely to be adequate to cover the Postal Service's projected and future costs under the current system of regulation. This is one of the central issues in phase 1 of this case, since the Postal Service's claim of present and future revenue inadequacy is the linchpin of the Postal Service's challenge to the CPI cap on market-dominant rates. The requested information will not be available to the undersigned parties unless produced by the Postal Service.

Proposed Questions

1. The following questions relate to the projected volumes and revenues reported by the Postal Service in the FY 2017 Integrated Financial Plan (“IFP”) filed with the Commission on December 2, 2016.
 - a. Please provide the projected FY 2017 volume and revenue in the same class and product format as the FY 2016 Cost and Revenue Analysis (“CRA”) report filed in Docket No. ACR2016 as Library Reference USPS-FY16-1.
 - b. Please confirm that the projected FY 2017 volume and revenue reported on page 5 of the FY 2017 IFP was based on the actual FY 2016 volume as originally reported in the FY 2016 Revenue, Pieces, and Weight (“RPW”) report filed with the Commission on November 28, 2016. If not confirmed, please provide the base FY 2016 volume and revenue used for the projection in the same format as described in part a of this question.
2. The Postal Service filed a revised FY 2016 RPW report with the Commission on December 22, 2016. This report was also filed as library reference USPS-FY16-42 in Docket No. ACR2016.
 - a. Has the Postal Service revised the FY 2017 IFP volume and revenue forecast based on these revised RPW data?

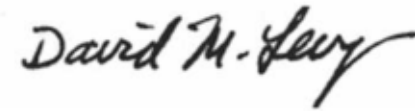
- b. If the FY 2017 volume and revenue forecast has been revised, please provide the revised FY 2017 volume and revenue forecast in the same class and product format as the FY 2016 CRA report.
 - c. If the FY 2017 volume and revenue forecast has been revised, please state whether the estimated costs projected for FY 2017, as shown at page 6 of the FY 2017 IFP, were also revised.
 - i. If the costs were revised, please provide the revised estimated FY 2017 costs in the same format as shown at page 6 of the FY 2017 IFP.
 - ii. In addition, please provide the new forecast for both the estimated “controllable income” and the total net loss for FY 2017, as shown at page 3 of the FY 2017 IFP.
3. Please refer to page 28 of the Postal Service’s 10-K, where the Postal Service reports its 2017-2021 estimated retiree health benefit amortization payments. Please provide, by year, the 2017-2021 estimated amortization payments separately for (a) FERS; and (b) CSRS.
4. Please refer to page 18-6 of the Summary Description of USPS Development of Costs by Segments and Components, Fiscal Year 2015 (filed July 6, 2016) where the Postal Service states, “[t]he benefits earned during the fiscal year by current employees, benefits not contained in the labor cost segments of 1-13, 16, 18, and 19, include both the retiree health benefits of \$2.8 billion and CSRS pensions of \$0.5 billion.” Please provide estimates of the “benefits earned during the fiscal

year by current employees, benefits not contained in the labor cost segments of 1-13, 16, 18, and 19” for CSRS pensions, separately by year, for FY 2016 to 2021.

CONCLUSION

The undersigned parties respectfully request that the Presiding Officer direct the Postal Service to answer the above questions.

Respectfully submitted,

A handwritten signature in black ink that reads "David M. Levy". The signature is fluid and cursive, with the first name "David" and last name "Levy" clearly legible.

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